

DEPARTMENT OF THE NAVY

NAVAL SUBMARINE BASE NEW LONDON GROTON, CONNECTICUT 06349-5000

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From: Commanding Officer, Naval Submarine Base New London

To: Distribution

SUBJ: RESTORATION ADVISORY BOARD (RAB) MINUTES FOR NAVAL

SUBMARINE BASE NEW LONDON

Encl: (1) Minutes from the 8 Aug 01 RAB Meetings

1. Draft minutes from the 8 Aug 01 RAB meeting are attached for review.

2. Please contact Mr. Richard Conant at (860) 694-5176 if you have any comments or questions concerning this matter.

ANDREW J. STACKPOLE
Environmental Director
By direction of the
Commanding Officer

Enclosure

Copy to: RAB Distribution List

Meeting Minutes

Restoration Advisory Board Installation Restoration Program Naval Submarine Base New London Groton, Connecticut

8 August 2001

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کم	(RAB Member)
.~~.	Bernie Boylan (Sierra Club)
,	(Public)
`	Kymberlee Keckler (EPA Region I)
	Pam Harting-Barrat Ph.D. (EPA Region I)
	Mark Lewis (CTDEP)
	Mark Evans (EFANE)
	Mike Fohner (EFANE)
	Dick Conant (NLSB)
	Andrew Stackpole (NLSB)
	Brain Conley (Foster Wheeler)
	Corey Rich. (TetraTech NUS)

- 1. Mr. Dick Conant opened the RAB meeting at 6:35 PM. The meeting began with a review of the minutes from the last meeting held on 9 May 01 at SUBASE. Hearing no objections or changes, the 9 May 01 minutes were accepted.
- 2. Ms. Kymberlee Keckler of the USEPA Region I office presented an overview of the procedures for conducting Five-Year Reviews at Superfund Sites (See attached handout). Ms. Keckler indicated that such reviews were required if contaminates remain on-site after completion of a remedial remedy. The purpose of the review is to evaluate the performance of each remedial remedy, and ensure that the remedies are still protective of human health and the environment. The review assesses the functionally of the remedial remedies, whether the remedies are still meeting their original objectives and standards, and examines any changes in the regulatory standards over the past five years that may impact the presumed efficacy of the remedies. The review consists of site visits, the assessment of any monitoring data collected for the remedial remedies, and recommendations for additional protective actions should the original remedial remedies be found to be not protective.
- 3. Mr. Corey Rich from Tetratech NUS presented the preliminary recommendations from the First Five-Year Review For CERCLA Sites at NSB-NLON (See attached handout). Mr. Rich reiterated that the Five-Year Review assessed the current functionality of remedial remedies, evaluated if the assumptions were still valid, and documented if any information had come to light to call into question the protectiveness

Meeting Minutes

of the remedy. The Five-Year Review assessed all 23 IR sites at SUBASE and was triggered by the completion of the Area A Landfill cap in December 1996. The review consisted of a compilation of pertinent site documents, a site inspection in April, 2001, limited interviews with key personnel, a technical assessment of the sites and the preparation of a final report. The report noted deficiencies at the Area A and DRMO landfill caps that included asphalt cracks, regrowth of vegetation, compromised monitoring wells, and lack of an O&M plan or access restrictions. Mr. Rich finished by indicating that the final report is due for public release in December, 2001.

Mr. Bart Pearson asked about who would fund and implement the O&M plan. Mr. Conant and Mr. Evans replied that the plan was currently being developed by an EFANE contractor and initial O&M reviews and remedial work would be funded by EFANE with this responsibility eventually being turned over to SUBASE. Ms. Keckler inquires if the SUBASE IR instruction included assess restrictions to the IR sites. Mr. Conant replied that the IR instruction required any party planning to excavate or disturb soil and/or groundwater in SUBASE IR sites to coordinate the project with the SUBASE Environmental Department prior to any start of work. Signage has also been posted at Area A and DRMO restricting the area to authorized personnel and prohibiting any surface disruption or excavation without prior coordination with the SUBASE Environmental Department.

4. Mr. Brian Conley of the Foster Wheeler Corporation presented a summary report on the recently completed Goss Cove Landfill Cap Remedial Project. Mr. Conley reviewed the eight month project with a series of photos showing project mobilization, storm sewer replacement, site grading, laying and welding of the geomembrane and final grading, restoration and landscaping of the site. Total project cost was \$ 5,466,000 with 30,000 labor-hours expended.

Ms. Keckler inquired as to how the box culvert sections were sealed. Mr. Conley replied that the gasketed culvert sections were drilled and pinned together before a final concrete sleeve was cast in place around the joint.

- 5. Mr. Mike Fohner, EFANE gave a presentation on the OBDANE remedial project, which was completed by the Foster Wheeler Corporation in May, 2001 (See attached handout). During the Phase II RI investigation, Site 14-OBDANE was determined to contain metal and pesticide residues from past uncontrolled dumping at the site. The remedial action stripped 270 tons of surficial material from the site for proper disposal at a regulated landfill off-site. Confirmational SPLP testing after removal confirmed no exceedences of the Connecticut RSRs and the site was restored with topsoil and seeded with an upland grass mixture. A project completion report is currently be generated by the contractor for release later in this calendar year.
- **6.** The next RAB was scheduled for 6:30 PM on 7 November 2001. Having no further business, Dick Conant closed the RAB meeting at 8:15 PM.

The Five-Year Review: Continuing to Protect You and the Environment Step 1: Develop Plan

To plan a five-year review, the site manager forms a review team, which may include an EPA Community Involvement Coordinator, scientists, engineers, and others. The team members decide what they will do at the site and when they will do it. The Community Involvement Coordinator is the member of the team who works with your community during the review.

<u>Your role:</u> EPA will announce the start of the review, probably through a notice in a newspaper or a flyer Review the notice to see when the review will start.

Step 2: Collect Information

The review team members collect information about site cleanup activities. They talk with people who have been working at the site over the past five years, as well as local officials, to see if changes in local policy or zoning might affect the original cleanup plan. The team usually visits the site to see if the cleanup equipment is working properly, to take new samples, and to review records of activities at the site to make sure the cleanup is still effective. Finally, the review team may talk to people who live or work near the site to learn about site activities during the past five years. They may give you a call or meet with you in person.

Your role: If you know anything about unusual site activities at or around the site, such as trespassing or odors, or have any other concerns, call the Community Involvement Coordinator.

Step 3: Ensure Safety, Announce Findings, and Publish a Report

The review team uses the information collected to decide if your community and the environment are still safe from the contaminated material left at the site. If the cleanup activities are keeping people and the environment safe, the team calls them "protective." When cleanup goals are not being met, or when problems come up, the review team will call the cleanup activities "not protective." When the team finishes the five-year review, it writes a report about the information that includes background on the site and cleanup activities, describes the review, and explains the results. The protectiveness statement and EPA's recommendations to fix any problems are part of the results. The review team also writes a summary and announces that the review is finished. They tell your community (via public notices, flyers, etc.) where to find copies of the report and summary-at a central place called the site repository-for anyone to see.

Your role: Read about the site and learn about the cleanup methods being reviewed Review the report. Ask the Community Involvement Coordinator any questions you have about the site.

What Happens After the Review?

As long as contaminated materials at the site stop people from freely using the land, EPA will do a review every five years. EPA also regularly monitors the site based on an operations and maintenance plan they develop. For example, the site manager may visit the site and read reports about activities at the site. Also, site workers may visit the site to cut the grass, take samples, or make sure equipment is working. If you see any problems or things that concern you-don't wait for the five-year review - let EPA know right away.

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Federal law requires a five-year review on Superfund sites that have been cleaned up-but where waste was left behind and limits the use of the property to ensure the site is still safe. Statutory reviews are required when the remedy was selected after October 17, 1986 (all are at NSB). EPA may also require five-year review as a matter of policy.

If a remedy results in any hazardous substances or contaminants remaining on-site, EPA (or the lead agency for the site) must review the remedial action no less often than every 5 years after the start of the remedial action to ensure that human health and the environment are protected by the remedial action being implemented. The purpose of a five-year review is not to reconsider the remedy decisions, but to evaluate the implementation and performance of it.

Executive Order 12580 gives the <u>authority to conduct five-year reviews to DOD</u>. <u>EPA</u>, however, retains the final <u>responsibility</u> to assure that five-year reviews conducted by any other federal lead agency <u>adequately addresses</u> the protectiveness of remedies.

- Is the remedy <u>functioning as intended</u> by the decision documents? (Met performance standards? RAOs in the ROD? Operating procedures effective?)
- Are the <u>assumptions</u> used at the time of remedy <u>still</u> <u>valid</u>? (Have there been changes in land use; changes in standards)
- Has any other information come to light that could <u>call</u> into question the protectiveness of the remedy? (Natural disasters such as a 100-year flood)

<u>Site visits</u>, evaluation of site <u>monitoring data</u> (particularly if there is information revealing a potential remedy failure), review of <u>access restrictions</u> and signs are all part of a five-year review

Recommendations are made in the five-year review report (usually to continue monitoring, maintain fencing, and move forward with the cleanup schedule)

If the remedy is determined to not adequately protect human health and the environment, <u>EPA may require</u> <u>additional action</u>

FIVE-YEAR REVIEW

Under CERCLA Section 121 (c), sites where remedial actions result in hazardous substances, pollutants, or contaminants remaining above action levels and do not allow for unlimited use and unrestricted exposure, must be reviewed every five years to assure protection of human health and the environment.

FIRST-FIVE YEAR REVIEW AT NSB-NLON, GROTON, CT

- Triggering action for the first five-year review was the initiation of the remedial action at Site 2 (Area A Landfill) in December 1996.
- All of the IR sites undergoing CERCLA investigations were included in the review.
- Reviews classified as statutory, policy, or at the request of EPA based on remedial actions and status in CERCLA process.

STATUTORY REVIEW SITES

- Site 2 Area A Landfill
- ▶ Site 6 DRMO
- Site 8 Goss Cove Landfill

EPA REQUESTED REVIEW SITES

- Site 2 Area A Wetland
- Site 7 Torpedo Shops
- Site 16 HospitalIncinerators
- Site 18 Solvent StorageArea (Bldg. 33)
- Site 19 Solvent StorageArea (Bldg. 316)

- Site 21 Berth 16
- Site 22 Pier 33
- Site 24 Central Paint Accumulation Area (Bldg. 174)
- Site 25 ClassifiedMaterials Incinerator

SITE 2 - AREA A LANDFILL

- REMEDIAL ACTION
 - **Engineered cover system**
 - **Access restrictions**
 - **Groundwater monitoring**
- **SITE INSPECTION**
 - **O&M** problems
 - **Access restrictions**
 - **Depression/settlement**
- ▶ ASSESSMENT O&M and access restrictions

DEFICIENCIES - No O&M

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- RECOMMENDATIONS
 - **Implement O&M Plan**
 - **Continue GWMP/Optimize**
 - **Access restrictions**
 - **Enforce Instruction**
- PROTECTIVENESS
 - Remedy is currently protective



SITE 8 - GOSS COVE LANDFILL

- **REMEDIAL ACTION**
 - I Engineered control cap
 - I Institutional controls
 - I Groundwater monitoring
 - 1 0&M
- SITE INSPECTION
 - I Under construction during inspection (subsequently completed in June '01)
- **ASSESSMENT TBD**

- DEFICIENCIES TBD
- RECOMMENDATIONS
 - I Prepare Final Report
 - I Initiate GWMP
 - I Prepare SW NFA DD
 - I Implement O&M Plan
 - I Enforce Instruction
- **PROTECTIVENESS**
 - I After construction, remedy will be protective



CONCLUSIONS FOR SITES REVIEWED AT EPA REQUEST

- Complete RI/FS process
- Enforce Instruction as necessary
- Prepare/Present PRAPs
- Sign RODs/Decision Documents
- Continue Five-Year Reviews as necessary

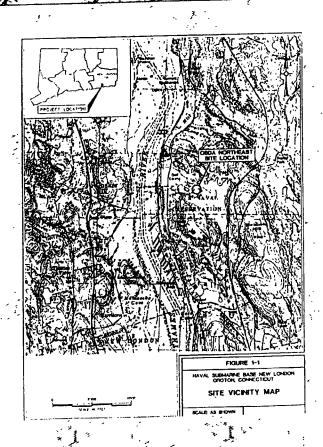
SCHEDULE

- DRAFT FIVE-YEAR REVIEW REPORT (June 2001)
- **PEPA COMMENTS**
 - I Received July 2001
 - I Resolved August 2001
- CTDEP COMMENTS
 - I Received/Resolved TBD
- FINAL FIVE-YEAR REVIEW REPORT (Dec 2001)

Over the Bank Disposal Area Northeas (OBDANE) Removal Action - May 2001

- 269.72 tons of material was removed and transported to a non-hazardous land fill.
- Twelve "grab" samples were taken from the excavated area. Of these 12, the four with the highest total inorganic concentrations were re-analyzed using the synthetic precipitation leaching procedure (SPLP) EPA Method 1312.
- Results of all four of these samples confirmed that SPLP metal concentrations were below the GB Pollutant Mobility Criteria.

Removal Action May 2001

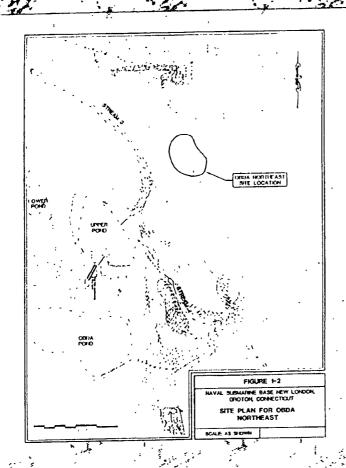


various wastes were apparently dumped over the bedrock edge. The site was circular and approximately 80 feet in diameter.

Removal Action - May 2001

Site Location - The OBDANE Site is located in a heavily wooded area on the edge of a ravine in close proximity to the Area A Downstream, northwest of the Area A Landfill, west of the Area A Weapons Center and south of the Torpedo Shops.

Removal Action May 2001



The site is bordered by a 20-foot-high bedrock face to the east and has a fairly steep slope to the southeast. A dirt road provides limited access to the wooded site.

Removal Action - May 2001

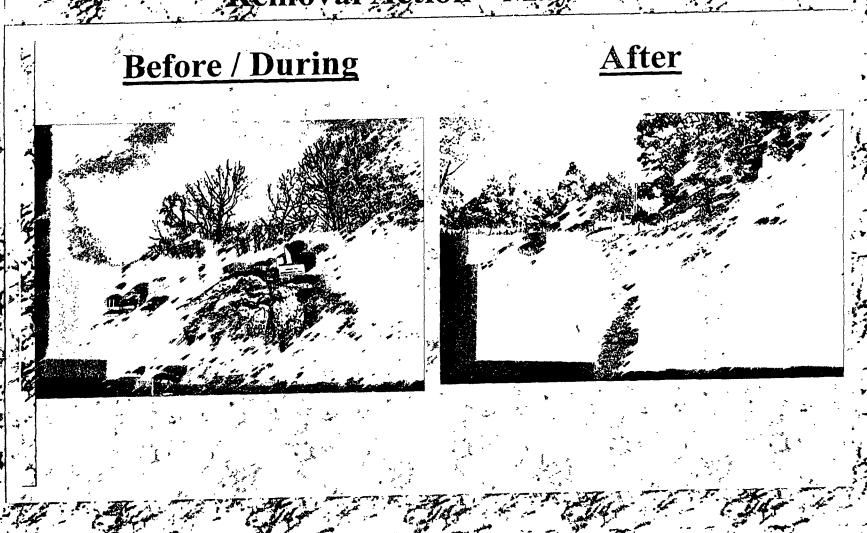
Remedial Investigation, conducted in 1997, showed elevated levels of pesticides and metals in the soil along with miscellaneous surface debris that required removal.

Removal Action - May 2001

- Erosion Controls
- Site Clearing
- Soil Removal
- Restoration







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BCC: Correspondence file
Dick Conant (RAB file)